# FILED USDC - CLRK DET 2021 APR 21 PM4:46

# UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

United States of America,

Criminal No. 21-cr-20037

Plaintiff,

Honorable Linda V. Parker

v.

Violations:

18 U.S.C. § 922(g)(1)

- D-1 Kalon Shade,
- D-2 Darnell Lee, Jr.,
- D-3 Christopher Calwise,

Defendants.

# **SUPERSEDING INDICTMENT**

THE GRAND JURY CHARGES:

## **COUNT ONE**

18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm

On or about January 6, 2021, in the Eastern District of Michigan, and elsewhere, defendant KALON SHADE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is: one (1) Ruger P90 .45 ACP, bearing serial number: 661-25194, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT TWO**

18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm

On or about January 6, 2021, in the Eastern District of Michigan, and elsewhere, defendant DARNELL LEE JR., knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is: one (1) Ruger P90 .45 ACP, bearing serial number: 661-25194, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT THREE**

18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm

On or about November 20, 2020, in the Eastern District of Michigan, and elsewhere, defendant KALON SHADE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is: one (1) TNW (Tech Network Inc.) Model ASR (Aero Surveillance Rife) 9 x 19mm caliber semi-automatic pistol, bearing serial number M2279, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

#### **COUNT FOUR**

18 U.S.C. § 922(g)(1)
Felon in Possession of a Firearm

On or about November 20, 2020, in the Eastern District of Michigan, and elsewhere, defendant DARNELL LEE JR., knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is: one (1) TNW (Tech Network Inc.) Model ASR (Aero Surveillance Rife) 9 x 19mm caliber semi-automatic pistol, bearing serial number M2279, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

## **COUNT FIVE**

18 U.S.C. § 922(g)(1) Felon in Possession of a Firearm

On or about November 20, 2020, in the Eastern District of Michigan, and elsewhere, defendant CHRISTOPHER CALWISE, knowing that he had been previously convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, that is: one (1) TNW (Tech Network Inc.) Model ASR (Aero Surveillance Rife) 9 x 19mm caliber semi-automatic pistol, bearing serial number M2279, said firearm having previously traveled in interstate and/or foreign commerce, in violation of Title 18, United States Code, Section 922(g)(1).

#### **FORFEITURE ALLEGATIONS**

(18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c))

The allegations contained in this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d) together with Title 28, United States Code, Section 2461.

Upon being convicted of violating Title 18, United States Code, Section 922, as set forth in this Indictment, the convicted defendants KALON SHADE,

DARNELL LEE JR., and CHRISTOPHER CALWISE shall forfeit to the United

States any firearm and ammunition involved in the offense, pursuant to Title 18,

United States Code, Section 924(d)(1) together with Title 28, United States Code,

Section 2461(c), including but not limited to:

- One (1) Ruger P90 .45 ACP, bearing serial number: 661-25194, and
- One (1) TNW (Tech Network Inc.) Model ASR (Aero Surveillance Rife) 9 x

19mm caliber semi-automatic pistol, bearing serial number M2279

THIS IS A TRUE BILL

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

CRAIG WININGER Chief, Violent and Organized Crime Unit

s/Ranya Elzein

RANYA ELZEIN
Assistant United States Attorney

Dated: April 21, 2021

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet		Case Number: 21-cr-20037	
NOTE: It is the responsibility of the Assistant U.S. Attor	ney signing this form to comple	ete it accurately in all respects	i.	· <b> </b>
Companion Case Information	Companion Case	Number:	26	
This may be a companion case based on	LCrR 57.10(b)(4) <sup>1</sup> :			GLRX
□Yes ☑No		AUSA's Initials:	RE	FILED USDC - C 2021 APR 21
Case Title: USA v. Kalon Sha	de, et al.			USD 1 APP
County where offense occurred: Wayne				LED 202
Offense Type: Felony				
Indictment – based upon LCrR 57.10 (d) [Complete Superseding section below].				
Superseding Case Information				
Superseding to Case No: 21-cr	-20037	Judge:	Linda V. Parker	
Reason: Embraces same subject matter but adds the additional defendants or charges below:				
Defendant Name D-1 Kalon Shade D-2 Darnell Lee, Jr. D-3 Christopher Calwise		22(g)(1)	Prior Complaint (if app	licable)
Please take notice that the below the above captioned case	listed Assistant L	Inited States Atto	rney is the attorney of	record for
·			7	
April 21, 2021		K	(6)	
Date Ranya Elzein (6090887 (Ohio))				
Assistant United States Attorney 211 W. Fort Street, Suite 2001				
Detroit, MI 48226				
ranya.elzein@usdoj.gov (313) 226-9518				

<sup>&</sup>lt;sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.